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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
SEP 06 2023
SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

7 UNITED STATES DISTRICT COURT
8 FOR THE EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA,

2:23-CR-0096-MKD

10 Plaintiff,

INDICTMENT

11 v.

12 JOHNATHAN FREEMAN HUNT,
13 Defendant.
14 18 U.S.C. § 2252A(a)(2)(A), (b)(1)
15 Receipt of Child Pornography
16 (Count 1)

17 18 U.S.C. § 2252A(a)(2)(A), (b)(1)
18 Distribution of Child Pornography
19 (Count 2)

20 18 U.S.C. § 2252A(a)(5)(B), (b)(2)
21 Possession of Child Pornography
22 (Count 3)

23 18 U.S.C. § 2253
24 Forfeiture Allegations

25 The Grand Jury charges:

COUNT 1

26 On or about July 30, 2022, and continuing through on or about November 27,
27 2022, in the Eastern District of Washington, the Defendant, JOHNATHAN
28 FREEMAN HUNT, did knowingly receive child pornography, as defined in 18
U.S.C. § 2256(8)(A), that had been mailed, shipped and transported in interstate
commerce by any means, including by computer, to wit: images depicting minor

1 and prepubescent children engaging in sexually explicit conduct, including but not
2 limited to the lascivious exhibition of the genitals and pubic area, in violation of 18
3 U.S.C. § 2252A(a)(2)(A), (b)(1).

4 COUNT 2

5 On or about July 30, 2022, and continuing through on or about November 27,
6 2022, in the Eastern District of Washington, the Defendant, JOHNATHAN
7 FREEMAN HUNT, did knowingly distribute child pornography, as defined in 18
8 U.S.C. § 2256(8)(A), that had been mailed, shipped and transported in interstate
9 commerce by any means, including by computer, to wit: images depicting minor
10 and prepubescent children engaging in sexually explicit conduct, including but not
11 limited to the lascivious exhibition of the genitals and pubic area, in violation of 18
12 U.S.C. § 2252A(a)(2)(A), (b)(1).

13 COUNT 3

14 On or about November 30, 2022 in the Eastern District of Washington, the
15 Defendant, JOHNATHAN FREEMAN HUNT, did knowingly possess material in
16 addition to the material alleged in Count 1, which contained one or more visual
17 depictions of child pornography, as defined in 18 U.S.C. § 2256(8)(A), including
18 images of prepubescent minors and minors who had not attained twelve years of
19 age, the production of which involved the use of a minor engaging in sexually
20 explicit conduct, and which visual depictions were of such conduct; that had been
21 mailed, shipped and transported in interstate and foreign commerce, and which
22 were produced using materials that had been mailed, shipped and transported in
23 interstate or foreign commerce, by any means including computer, all in violation
24 of 18 U.S.C. § 2252(a)(5)(B), (b)(2).

25 NOTICE OF FORFEITURE ALLEGATIONS

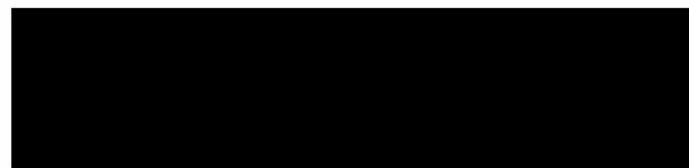
26 The allegations contained in this Indictment are hereby realleged and
27 incorporated by reference for the purpose of alleging forfeitures.
28

Pursuant to 18 U.S.C. § 2253, upon conviction of an offense or offenses in violation of 18 U.S.C. § 2252A(a)(2)(A), (b)(1), and/or 18 U.S.C. § 2252(a)(5)(B), (b)(2), as set forth in this Indictment, the Defendant, JOHNATHAN FREEMAN HUNT, shall forfeit to the United States any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and, any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, or any property traceable to such property, including, but not limited to:

- a 2 TB Western Digital Hard Drive, Model: WDBY8L0020BBK; Serial No.:WX21E42UE328; and
- an HP Laptop, Serial No.: 5CD7379XP9 and 1 TB HGST Hard Drive Disk, Model: HTS721010A9E630; Serial No.: 170302JR1004BN1009TM.

DATED this 6 day of September, 2023.

A TRUE BILL



Vanessa Waldref
Vanessa Waldref
United States Attorney

A. Wick
Ann T. Wick
Assistant United States Attorney